

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE PHARMACEUTICAL INDUSTRY )  
AVERAGE WHOLESAL PRICE )  
LITIGATION )

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MDL No. 1456

Civil Action No. 01-CV-12257 PBS

THIS DOCUMENT RELATES )  
TO )

Judge Patti B. Saris

*County of Suffolk v.* )  
*Abbott Laboratories, Inc., et al.,* )  
E.D.N.Y. Case No. CV-03-229 )

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**DEFENDANT-SPECIFIC REPLIES**  
**IN SUPPORT OF THE MOTION TO DISMISS**

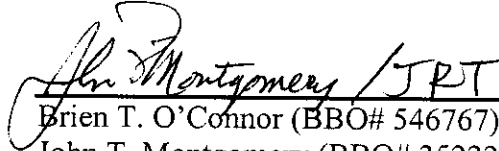
The following defendants submit the attached Defendant-Specific Replies in Support of the Motion to Dismiss: Abbott Laboratories, Inc.; Amgen Inc.; AstraZeneca Pharmaceuticals LP; Bayer Corporation; Forest Pharmaceuticals, Inc.; MedImmune, Inc.; Novartis Pharmaceuticals Corporation; Pfizer Inc.; Pharmacia Corporation and Pharmacia & Upjohn, Inc.; Purdue Pharma L.P.; Sanofi-Synthelabo Inc.; Schering-Plough Corporation; TAP Pharmaceutical Products, Inc.; and Warrick Pharmaceuticals Corporation.

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Counsel for defendants hereby certify that they have conferred with plaintiffs in a good faith attempt to narrow or resolve the issues presented by these memoranda.

**Schering-Plough Corporation  
Warrick Pharmaceuticals Corporation**

By their attorneys

  
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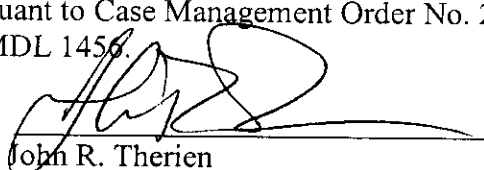
Boston, MA 02110

(617) 951-7000

Dated: November 14, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2003, I caused a true and correct copy of the Defendant-Specific Replies in Support of the Motion to Dismiss to be served on all counsel of record by electronic service pursuant to Case Management Order No. 2 entered by the Honorable Patti B. Saris in MDL 1456.

  
John R. Therien